

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF TEXAS, DALLAS DIVISION

CITY OF DALLAS,

Plaintiff,

V.

DELTA AIR LINES, INC., SOUTHWEST AIRLINES CO., VIRGIN AMERICA INC., AMERICAN AIRLINES, INC., UNITED AIRLINES, INC., SEAPORT AIRLINES, INC., UNITED STATES DEPARTMENT OF TRANSPORTATION, AND THE FEDERAL AVIATION ADMINISTRATION

Defendants.

CIVIL ACTION NO. 3:15-CV-02069-K

**DELTA AIR LINES, INC.'S RESPONSE TO PLAINTIFF CITY OF DALLAS'S
MOTION FOR SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56 and Local Rule 56.4, Delta Air Lines, Inc. hereby respectfully files this response moving for an order denying the City of Dallas's Motion for Summary Judgment or Partial Summary Judgment, and In Addition or In the Alternative, Motion for Entry of Permanent Injunction (the "City's Motion") (Dkt. 436). Delta's contemporaneously filed brief in support sets forth the grounds for Delta's opposition to the City's Motion, which seeks the Court's approval of the City's unlawful accommodation policy. As allowed under Local Rule 56.4, the grounds for the opposition to the motion are set forth in the brief and its accompanying appendix submitted concurrently herewith.

DATED: June 13, 2018

Respectfully submitted,

/s/ William B. Dawson

William B. Dawson

SBN 05606300

Ashley E. Johnson

SBN 24067689

Russell H. Falconer

SBN 24069695

GIBSON, DUNN & CRUTCHER LLP

2100 McKinney Avenue, Suite 1100

Dallas, Texas 75201-6911

Telephone: (214) 698-3100

Facsimile: (214) 698-3400

wdawson@gibsondunn.com

ajohnson@gibsondunn.com

rfalconer@gibsondunn.com

ATTORNEYS FOR DELTA AIR LINES, INC.

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of June, 2018, a true and correct copy of the foregoing brief was served via the Court's CM/ECF System upon all counsel of record.

/s/ William B. Dawson
William B. Dawson